

N60200.AR.007129
NAS CECIL FIELD
5090.3a

U S EPA REGION IV COMMENTS TO PROPOSED RECORD OF DECISION OPERABLE
UNIT 1 (OU1) WITH TRANSMITTAL NAS CECIL FIELD FL
8/28/1995
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

August 28, 1995

4WD-FFB

Mr. Steve Wilson
Department of the Navy
Southern Division
NAVFAC
Code 1889
2155 Eagle Drive
North Charleston, South Carolina 29411-0068

Dear Mr. Wilson:

Attached are the Environmental Protection Agency comments on the proposed Record of Decision (ROD) for Operable Unit 1 at NAS Cecil Field. Please address these comments and submit the ROD for approval.

Should you have any questions, please contact me at (404)347-3555 extension 2049.

Sincerely,

A handwritten signature in black ink, appearing to read "Bart Reedy", with a long horizontal flourish extending to the right.

Bart Reedy, RPM
Base Realignment and Closure Team
Federal Facilities Branch

Enclosure

cc: Mike Deliz, FDEP
Rao Angara, ABB

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HEALTH

1. The second page was missing in the Declaration. It is not vital to my review.
2. The orange-red flocculent material results from the action of iron-oxidizing bacteria on iron rich groundwater leaching from the landfill area. In a previous meeting, the lack of identification of these bacteria was presented as a data gap. The ROD does not present an identification of the bacteria. Has the specific bacterium species been identified?

GROUNDWATER

3. Section 1.4.2, Risk Reduction, indicates that a monitoring alternative is selected for ecological risk reduction. While such monitoring may be advisable, monitoring by itself does not result in any risk reduction. Thus, defining the selected remedy as a "risk reduction" remedial action is misleading or erroneous.
4. Because Table 2-5 of the ROD states that the selected "risk-reduction" alternative does not meet the threshold criteria of overall protection of human health and the environment or compliance with ARARs, it does not appear to comply with the amended CERCLA regulations Section 121(b) and Section 121(d). The ROD indicates that there may be an environmental risk from performing an active remedial action on the surface water or wetlands areas around OU1. If so, it may be possible to invoke a waiver of ARARs, per CERCLA Section 121(d)(4)(B), for an active wetlands/surface water remedial action. However, such an ARAR waiver does not address the requirement that the selected remedy attain overall protection of human health and the environment. Additionally, it is possible that a more complete source control component of the remedial action may result in attainment of the threshold criteria for surface water. This possibility is not addressed in the draft ROD.
5. There may be adequate justification for avoiding implementation of an active remedial alternative in the surface waters or wetlands at OU1. If so, the ROD should more fully explain (citing both the technical and appropriate legal bases) why an active remedial alternative in the wetlands or surface water is unwarranted and unnecessary. Additionally, the ROD should also consider the potential for the most comprehensive source control action (SC-

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3.
2) to attain or address the CERCLA-specified threshold criteria and ARARs which apply to the surface water and wetlands. Table 2-4 and the discussion in Section 2.7 completely ignore any effects that source control would have on the environmental receptors.

ECOLOGY

6. One page was missing from my review copy of the Draft ROD (i.e., between Section 1.3 and 1.4.1). Also, my comments are listed by section number only, since there are no page numbers in the review copy.
7. Sec. 1.4.2: Expand the purpose of the biomonitoring for risk reduction. Ecological impacts have already been noted for Site 2 and its tributary (i.e., impairment of the benthic macroinvertebrate community; reduced survival and reproductive rates for a representative benthic macroinvertebrate species). The remaining issue for those areas is whether the impacts are related to site contaminants or to other factors (i.e., iron-based orange-red flocculent material). Since no ecological impacts were found in Rowell Creek, it seems that the purpose of the biomonitoring would be three-fold: to see if chemical and biological conditions improve for biota at Site 2 and its tributary; to determine whether the impacts are spreading to Rowell Creek or are being limited to Site 2 and its tributary; and, if possible, to determine the cause(s) of the impacts. (See the remedial action objectives in Section 2.4.)

Sec. 1.5:

8. In paragraphs 1 and 2, explain how "the current system of wetlands, the drainage structure, and the Site 2 tributary may be serving as an effective remedial system." Is this referring to possible long-term natural attenuation/remediation for protecting ecological receptors in the wetlands, drainage structure, and Site 2 tributary or current protection for ecological receptors in Rowell Creek?
9. Paragraph 2 states that the selected alternatives for source control and risk reduction comply with ARARs, yet Section 2.9, paragraph 2, states that risk reduction alternative 1 (biomonitoring) does not meet all ARARs. Modify paragraph 2 to address this point.

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Sec. 2.7

10. **RR-1 Biomonitoring: As mentioned above, explain how "the current system of wetlands, the drainage structure, and the tributary may be serving as an effective remedial system."**

Sec. 2.9:

11. **Mention that the selected remedial alternative for risk reduction might not meet the remedial action objectives for surface water and sediment as given in Section 2.4.**
12. **Following the statement in paragraph 2 that some ARARs are not met by risk reduction alternative RRI, refer to Section 2.10 as well as Section 2.8, Table 2-5.**
13. **Table 2-5: Under Compliance with ARARs for Alternative RR-1, list the three metals which exceed the Florida Surface Water Quality Standards.**
14. **Table 2-7: Include the Florida Surface Water Quality Standards as an ARAR. They were formerly given in FAC 17.302, but they have apparently been updated (FAC 62). Please check on this.**

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